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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**AMY MOORE, MIA LYTELL, NATASHA  
TAGAI, EMMA HOPPER, BRITTANY  
HASSEN and BRITTANY REYES,**

Plaintiffs,

– against –

**HOWARD RUBIN,**

Defendant.

Case No.: 1:17-cv-06404-BMC

**AFFIDAVIT OF JOHN G.  
BALESTRIERE IN SUPPORT OF  
BALESTRIERE FARIELLO'S  
MOTION TO WITHDRAW AS  
COUNSEL**

STATE OF NEW YORK     )  
                                  s.s.:  
COUNTY OF NEW YORK )

I, John G. Balestriere, an attorney duly admitted to practice law in the Eastern District of New York, of legal age and under penalty of perjury, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am an attorney at the law firm Balestriere Fariello (the "Firm," or "Plaintiffs' Counsel"). I represent Plaintiffs Amy Moore ("Moore"), Mia Lytell ("Lytell"), Natasha Tagai ("Tagai"), Emma Hopper ("Hopper"), Brittany Hassen ("Hassen"), and

Brittany Reyes (“Reyes”) (collectively, “Plaintiffs”) in the above-referenced action against Defendant Howard Rubin (“Rubin”).

2. I am fully familiar with the facts stated herein and make this affidavit in support of my motion to withdraw as counsel to the Plaintiffs.

3. The law firm Balestriere Fariello is in dissolution and has terminated its operations. Due to an ongoing dispute with a litigation funder, Pravati Capital, LLC, and related economic circumstances from that dispute, I will not be able to continue with this case.

4. I have communicated this to the Plaintiffs, including their right to counsel of their choosing, and that I am moving to withdraw for the reason of the dissolution of Balestriere Fariello and no other reason.

5. Balestriere Fariello maintains a charging lien.

6. I respectfully request a stay of at least 30 days for Plaintiffs to obtain new counsel.

7. Plaintiffs respectfully request the opportunity to appear before the Court regarding this motion and the request for a stay in this case.

Dated: New York, New York  
August 21, 2024

By: \_\_\_\_\_

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Sworn to before me this  
21st day of August, 2024



Notary Public

